

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

ALLY LANDAU et al.,

*Plaintiffs,*

v.

THE CORPORATION OF HAVERFORD  
COLLEGE,

*Defendant.*

---

CIVIL ACTION

No. 2:24-cv-02044-GAM

**DECLARATION OF PLAINTIFF “HJSC” IN SUPPORT OF MOTION TO PROCEED  
UNDER PSEUDONYMS**

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the following is true and correct:

1. I am the Plaintiff known as “HJSC” in the Amended Complaint filed in the above-captioned lawsuit.

2. I am a Jewish undergraduate student at Haverford College. I am a junior scheduled to graduate in May 2026.

3. I am requesting that this Court permit me to continue using the pseudonym “HJSC” during this litigation.

4. The reason that I want to continue using a pseudonym is simple: Since the October 7, 2023 attacks on Israel, Haverford has become an extremely hostile place for Jewish students, especially those who openly express support for Israel. If other Haverford students learned that I am a Plaintiff in this case, I expect that I would swiftly become a pariah on Haverford’s small campus, as well as a target for harassment and intimidation.

5. Since the October 7 attacks, I have been repeatedly insulted by other students at Haverford, who have attempted to tell me that my commitment to Israel has nothing to do with my religion. Haverford students have shunned me because I have taken the position that Israel has the right to exist as a Jewish state. I have even been told that Jews exaggerate the Holocaust.

6. The climate for some Jews on Haverford's campus is so hostile that sometimes I have had to change my daily routine on campus. For example, I repeatedly have had to avoid masked individuals actively protesting Israel's response to the October 7, 2023 attacks. Seeing individuals wearing head and shoulder garments in a manner like that worn by Hamas terrorists has been intimidating to me. I understand that someone on campus was called a "dirty Zionist" by protesters.

7. The hostile atmosphere on campus has also seeped into my courses. For example, one of my professors has repeatedly used class time to allow students to talk about Israel committing "genocide." This course had nothing to do with Israel or religion generally.

8. If forced to identify myself in this case, I expect that my academic performance would suffer. Haverford has small, communal classes. Students are expected to work together in these courses. I expect that my classmates would refuse to work with me if they knew I was a Plaintiff in this case.

9. Haverford College is a very small school with only 1,400 students. The campus has only one cafeteria. All of its academic buildings and dorms are concentrated in a relatively small area. If my identity is revealed, it would be impossible, unlike at other larger schools, to simply avoid gatherings of people who discriminate against Israel-supporting Jews. There is no space in a college of this size to seek comfort in numbers or to show up only at places where my position as a Plaintiff would not be known.

10. Given the high likelihood of retaliation if my involvement were known in this case, I have not told any Haverford students (with the exception of the other Plaintiffs) that I am a Plaintiff in this case. I did disclose that I am a Plaintiff to one Haverford professor who sympathizes with my position. This professor agreed to keep this disclosure in confidence.

11. I am a private figure with little public exposure outside of Haverford's small campus.

12. If forced to proceed under my own name in this case—particularly while I remain a student at Haverford—I would be inclined to reconsider serving as a Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
Nov 8, 2024.

  
"HJSC" SIGN 192QKLV3-1XPQJ79V